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STATE OF COLORADO

DUE DATE

ACTION

Bill Owens, Governor  
Douglas H. Benevento, Executive DirectorCORRESPONDENCE  
CONTROL

Dedicated to protecting and improving the health and environment of the people of Colorado

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(303) 692-3090<http://www.cdphe.state.co.us>Colorado Department  
of Public Health  
and Environment

DIST.	LTR	ENC
BERARDINI, J.H.	X	X
BOGNAR, E.S.	X	X
BROOKS, L.	X	X
CARPENTER, M.	X	X
CIUCCI, J.A.		
CROCKETT, G. A.		
DECK, C. A.	X	X
DEGENHART, K. R.		
DEL VECCHIO, D.		
DIETER, T. J.		
FERRERA, D. W.	X	X
GIACOMINI, J. J.		
LINDSAY, D. C.	X	X
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NESTA, S.	X	X
NORTH, K.	X	X
SHELTON, D. C.	X	X
SPEARS, M. S.	X	X
TUOR, N. R.	X	X
WIEMELT, K.	X	X
WILLIAMS, J. L.		
ZAHM, C.	X	X

December 7, 2004

Mr. Joseph Legare  
Director, Project Management Division  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, Colorado 80403-8200

RE: Approval, Draft Data Summary Report for IHSS Group 400-5, IHSS 400-205 - Sump #3 Acid Site, PAC 400-813 and PAC 400-815 - Tank Leaks in Building 460 &amp; Status of "RCRA Unit 8"

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the subject report and, as a consequence, No Further Accelerated Action (NFAA) for IHSS Group 400-5. A comment resolution meeting, revisions submitted electronically and subsequent e-mails were successful in resolving the Division's comments, attached.


The principle issue was the status of a RCRA unit, Unit 8 - acid dumpsters, associated with IHSS 400-205. The two dumpsters were reported to have operated under interim status in 1986 and 1987, to be converted to 90-day waste accumulation areas, and then withdrawn from the RCRA permit on February 10, 1995.

The Division has since located and reviewed the 1995 letter. The letter actually states that interviews and inspection logs showed that the acid dumpsters had always operated as 90-day accumulation units, never converted to interim status. Inclusion in the Part A permit application was erroneous. Consequently, a formal RCRA closure of the unit was not necessary and continued management as a 90-day accumulation area was sufficient.

The letter further notes that in 1991 the dumpsters were triple rinsed and remained empty prior to being removed and stored for possible future use. The bermed areas where the dumpsters were located have been sampled. That sampling, and the discussion of the fate of caustic solutions in the environment, supports NFAA for that portion of this IHSS Group.

We look forward to confirming that minor additional changes are reflected in the final document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or Harlen Ainscough at 303-692-3337.

Sincerely,

  
Steven H. Gunderson  
RFCA Project Coordinator  
Attachment
Reviewed for Addressee  
Corres. Control RFP12/13/04  
Date By

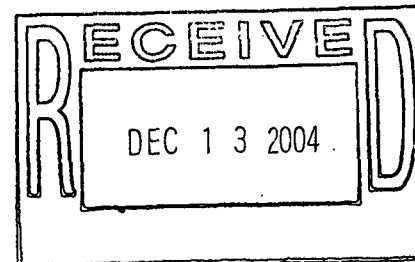
Ref. Ltr. #

cc: Mark Aguilar, EPA  
Larry Kimmel, EPA  
Dave Shelton, KH  
Steve Nesta, K-HMark Sattelberg, U.S.F&W  
Norma Castaneda, DOE  
Karen Wiemelt, KH  
Administrative Records Building T130G

DOE ORDER #

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ADMIN RECORD

IA-A-002497

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Data Summary Report

for

IHSS Group 400-5

IHSS 400-205 -- Sump # 3 Acid Site

PAC 400-813 RCRA -- Tank Leak in Building 460

PAC 400-815 RCRA -- Tank Leak in Building 460

October 2004

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Specific Comments:

1. Section 2.1.1: The basis for the dumpster unit's interim status in 1986-87 is the HRR, as reiterated in Appendix C of the IASAP. The site's current RCRA Master List, Line 9, shows that it was operated as a 90-day accumulation and that it was withdrawn from the RCRA permit on 2/10/95. It appears that the site was not properly closed. Rather than attempt to confirm or refute whether interim status was correctly applied, and the unit closed, it would be acceptable to document closure at this time. The approach used to address the caustic releases to Central Avenue Ditch should be considered as justification.
2. Section 2.1.1: In the first paragraph, page 3, "tanks" are discussed. If this refers to the dumpsters, please be consistent.
3. Section 2.1.2: In the first paragraph of the section 2 gallons were "found" in secondary containment piping. In the second paragraph, "some of the waste had been released to the environment." It appears that a greater quantity could have been released with two gallons remaining in the piping. It should be clarified that the "some of the waste" quantity may have been well in excess of the 2 gallons unless inventory records showed otherwise.
4. Section 2.1.2: In respect to Comment 3, the first bullet of page 4 should be deleted; it is not a valid rationale. The amount that actually may have been released to the environment, that which did not remain in the piping, appears to be unknown.
5. Table 2: Under the Comments to BV35-002, change "north" to "south". BV35-004 is the "south" location.
6. BW36-043: Relative to the "Comment", Figure 2 indicates that the "A" interval, 0.0-0.5 feet, was collected. Please address. Also, please clarify whether the B interval was collected from the "construction sand fill" interval, which was augered to a depth of four feet, or below the sand fill.
7. Section 2.2: On page 8 of the section, second paragraph, please clarify while responding to Comment No. 6. Figure 2 shows data for a 0-0.5 interval at BW36-043.
8. On page 8 of the section, third paragraph, please state that the sump is and will remain well below grade such that WRWs are not an issue. Further that the water samples indicate the source to be inadequate to impact surface water down gradient.
9. Section 2.3: Inherently, the SORs do not consider the sump location because soil samples could not be collected. However, a general, qualitative statement should be added, based on incidental ground water data on a part per billion basis, that SORs exceeding unity would be implausible.
10. Section 3.0: The statement in Section 2.2.1 regarding interim status, see Comment No. 1, must be included. RCRA closure, apparently, has not been performed.

11. **Section 4.0, Screen 4:** In the first paragraph, page 13, please note the incidental groundwater sample, see Comment No. 9.
12. **Section 6.2.1 LCS Evaluation:** Please explain why the unavailability of LCS data for gamma spectroscopy is acceptable QC.